



April 29, 2015

Dr. David C. Joyce
President

UPS Tracking No. 1ZA879640298171786

Brevard College
1 Brevard College Drive
Brevard, NC 28712-3306

RE: **Final Program Review Determination**
OPE ID: 00291200
PRCN: 2014-4-04-28773

Dear Mr. Joyce:

The U.S. Department of Education's (Department's) School Participation Division – Atlanta, issued a program review report on August 13, 2014 covering Brevard College's (BC's) administration of programs authorized by Title IV of the Higher Education Act of 1965, as amended, 20 U.S.C. §§ 1070 et seq. (Title IV, HEA programs), for the 2012-2013 and 2013-2014 award years. BC's final response was received on February 19, 2015. A copy of the program review report (and related attachments) and BC's response are attached. Any supporting documentation submitted with the response is being retained by the Department and is available for inspection by BC upon request. Additionally, this Final Program Review Determination (FPRD), related attachments, and any supporting documentation may be subject to release under the Freedom of Information Act (FOIA) and can be provided to other oversight entities after this FPRD is issued.

Purpose:

Final determinations have been made concerning all of the outstanding findings of the program review report. The purpose of this letter is to: (1) identify liabilities resulting from the findings of this program review report, (2) provide instructions for payment of liabilities to the Department and (3) notify the institution of its right to appeal.

The total liabilities due from the institution from this program review are **\$6,935**.

This final program review determination contains detailed information about the liability determination for all findings.

Protection of Personally Identifiable Information (PII):

PII is any information about an individual which can be used to distinguish or trace an individual's identity (some examples are name, social security number, date and place of birth). The loss of PII can result in substantial harm, embarrassment, and inconvenience to individuals

Federal Student Aid, School Participation Division - Atlanta
61 Forsyth Street SW, Room 18T40, Atlanta, GA 30303
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and may lead to identity theft or other fraudulent use of the information. PII is contained in Appendices A, B, and C.

Appeal Procedures:

This constitutes the Department's FPRD with respect to the liabilities identified from the August 13, 2014 program review report. If BC wishes to appeal to the Secretary for a review of financial liabilities established by the FPRD, the institution must file a written request for an administrative hearing. Please note that institutions may appeal financial liabilities only. The Department must receive the request no later than 45 days from the date BC receives this FPRD. An original and four copies of the information BC submits must be attached to the request. The request for an appeal must be sent to:

Robin Minor, Director (Acting)
Administrative Actions and Appeals Service Group
U.S. Department of Education
Federal Student Aid/PC
830 First Street, NE - UCP3, Room 84F2
Washington, DC 20002-8019

BC's appeal request must:

- (1) indicate the findings, issues and facts being disputed;
- (2) state the institution's position, together with pertinent facts and reasons supporting its position;
- (3) include all documentation it believes the Department should consider in support of the appeal. An institution may provide detailed liability information from a complete file review to appeal a projected liability amount. Any documents relative to the appeal that include PII data must be redacted except the student's name and last four digits of his / her social security number (please see the attached document, "Protection of Personally Identifiable Information," for instructions on how to mail "hard copy" records containing PII); and
- (4) include a copy of the FPRD. The program review control number (PRCN) must also accompany the request for review.

If the appeal request is complete and timely, the Department will schedule an administrative hearing in accordance with § 487(b)(2) of the HEA, 20 U.S.C. § 1094(b)(2). The procedures followed with respect to BC's appeal will be those provided in 34 C.F.R. Part 668, Subpart H. **Interest on the appealed liabilities shall continue to accrue at the applicable value of funds rate, as established by the United States Department of Treasury, or if the liabilities are for refunds, at the interest rate set forth in the loan promissory note(s).**

Record Retention:

Program records relating to the period covered by the program review must be retained until the later of: resolution of the loans, claims or expenditures questioned in the program review; or the

end of the retention period otherwise applicable to the record under 34 C.F.R. §§ 668.24(e)(1), (e)(2), and (e)(3).

The Department expresses its appreciation for the courtesy and cooperation extended during the review. If the institution has any questions regarding this letter, please contact Angelique James at 404-974-9441. Questions relating to any appeal of the FPRD should be directed to the address noted in the Appeal Procedures section of this letter.

Sincerely,



Chris Miller
Division Director

Enclosure:

Protection of Personally Identifiable Information
Program Review Report (and appendices)
Final Program Review Determination Report (and appendices)

cc: Caron Surrett, Financial Aid Administrator
Peter D. Hans-Chairman- North Carolina Board of Governors of the University of North Carolina
Belle S. Wheelan, Ph.D., President- Southern Association of Colleges and Schools
Commission on Colleges
Department of Defense
Department of Veterans Affairs
Consumer Financial Protection Bureau

PROTECTION OF PERSONALLY IDENTIFIABLE INFORMATION

Personally Identifiable Information (PII) being submitted to the Department must be protected. PII is any information about an individual which can be used to distinguish or trace an individual's identity (some examples are name, social security number, date and place of birth).

PII being submitted electronically or on media (e.g., CD-ROM, floppy disk, DVD) must be encrypted. The data must be submitted in a .zip file encrypted with Advanced Encryption Standard (AES) encryption (256-bit is preferred). The Department uses WinZip. However, files created with other encryption software are also acceptable, provided that they are compatible with WinZip (Version 9.0) and are encrypted with AES encryption. Zipped files using WinZip must be saved as Legacy compression (Zip 2.0 compatible).

The Department must receive an access password to view the encrypted information. The password must be e-mailed separately from the encrypted data. The password must be 12 characters in length and use three of the following: upper case letter, lower case letter, number, special character. A manifest must be included with the e-mail that lists the types of files being sent (a copy of the manifest must be retained by the sender).

Hard copy files and media containing PII must be:

- sent via a shipping method that can be tracked with signature required upon delivery
- double packaged in packaging that is approved by the shipping agent (FedEx, DHL, UPS, USPS)
- labeled with both the "To" and "From" addresses on both the inner and outer packages
- identified by a manifest included in the inner package that lists the types of files in the shipment (a copy of the manifest must be retained by the sender).

PII data cannot be sent via fax.

Prepared for
Brevard College

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OPE ID 002912
PRCN 2014-4-04-28773

Prepared by
U.S. Department of Education
Federal Student Aid
School Participation Division - Atlanta

Final Program Review Determination April 29, 2015

Federal Student Aid, School Participation Division - Atlanta
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A. Institutional Information

Brevard College
1 Brevard College Drive
Brevard, NC 28712-3306

Type: Private, Nonprofit

Highest Level of Offering: Bachelor's Degree

Accrediting Agency: Southern Association of Colleges and Schools Commission on Colleges

Current Student Enrollment: 633 (2012/2013)

% of Students Receiving Title IV: 73.4% (2012/2013)

Title IV Participation: Postsecondary Education Participants System (PEPS):

2012-2013 Award Year

Federal Pell Grant Program (Pell)	\$1,098,686
Federal Supplemental Education Opportunity Grant (SEOG)	\$38,894
Federal Work Study (FWS)	\$49,716
William D. Ford Direct Loan Program (Direct Loan)	\$4,101,604

Default Rate DL:	2011	10.3%
	2010	7.2%
	2009	11.1%

Default Rate Perkins:	2014	29.4%
	2013	32.0%
	2012	30.9%

B. Scope of Review

The U.S. Department of Education (the Department) conducted a program review at Brevard College (BC) from August 25, 2014 to August 29, 2014. The review was conducted by Angelique James.

Based upon an analysis of the Department's data (graduation and withdrawal data from National Student Loan Data System - NSLDS and Integrated Postsecondary Education Data System - IPEDS), the Department determined that BC had a high annual dropout rate. A random sample of 15 files was selected for review in the 2012-2013 and 2013-2014 (year to date) award years. Appendix A lists the names and partial social security numbers of the 30 students whose files were examined during the program review.

Disclaimer:

Although the review was thorough, it cannot be assumed to be all-inclusive. The absence of statements in the report concerning BC's specific practices and procedures must not be construed as acceptance, approval, or endorsement of those specific practices and procedures. Furthermore, it does not relieve BC of its obligation to comply with all of the statutory or regulatory provisions governing the Title IV, HEA programs.

C. Findings and Final Determinations

Resolved Findings

Findings 3, 4, 5, 6, 7 and 8

BC has taken the corrective actions necessary to resolve findings 3, 4, 5, 6, 7 and 8 of the program review report. Therefore, these findings may be considered closed. Findings requiring further action by BC are discussed below.

Resolved Finding with Comments

Finding 2: Inaccurate/Late Enrollment Reporting to the National Student Loan Data System

Citation: As noted in 34 C.F.R. § 685.309, schools are required to confirm and report the enrollment status of Title IV student aid recipients to the Department's NSLDS. This process is called Enrollment Reporting (or the Student Status Confirmation Report [SSCR]). One of the important functions of NSLDS is to maintain the enrollment status of Title IV recipients. The accuracy of enrollment reporting by schools is critical for many reasons, including ensuring that the obligations and benefits that the HEA provides for Title IV student loan recipients are respected. NSLDS enrollment information is also used by the Department for

a variety of other purposes, including tracking interest subsidy payments; budget allocations; and the evaluation of the Title IV programs.

The accuracy of Title IV student loan records depends on the accuracy of enrollment information reported by schools. Schools must review, update, and verify student enrollment statuses; effective dates of the enrollment status; and; the anticipated completion dates that appear on the Enrollment Reporting roster file or on the Enrollment Maintenance page of the NSLDS Web site. The certification date is the date a school certified the enrollment information.

An institution must have administrative and fiscal controls to timely report data. Upon receipt of an Enrollment Reporting roster file, the institution must complete and return that file to NSLDS within 30 days from the date the roster file was created. However, if a roster file is expected within 60 days (often referred to as batch reporting), a school may provide the updated data on that roster file. Title IV institutions must:

- Recertify enrollment status of all students on the enrollment roster even if there is no change in enrollment status.*
- Provide completion/graduation data accurately and timely when students complete their academic program.*
- Accurately and timely report students with a less than half-time enrollment status.*
- Add transfer students who have received Title IV aid elsewhere to their enrollment roster even if the students are not receiving aid at your school.*
- Provide an Anticipated Completion Date (ACD) for students.*

Title IV schools are ultimately responsible for timely and accurate reporting, even when they use an enrollment reporting servicer to submit enrollment reporting files. Schools may perform internal oversight or may receive a request for an audit history of enrollment reporting. Also, NSLDS provides tools for a school to monitor certification records that have been provided to NSLDS by the school or its servicer. Schools that do not comply may have their eligibility for Title IV aid revoked, or they may have fines imposed.

Please refer to the Department's Dear Colleague Letter (DCL-GEN-12-06, March 30, 2012) for additional requirements regarding NSLDS Enrollment Reporting.

Note: *On July 1, 2014, the Department began requesting enrollment information from schools every 60 days and schools are required to respond to those requests **within 15 days** of the date that the Department sent the enrollment reporting roster to the school.*

***Noncompliance:** The certification date of enrollment status as reported in NSLDS for the majority of the students in the sample was up to several months late. It appeared that students who did not change enrollment statuses were certified multiple times after their initial certification. This multiple certification process changed their certification date each month.*

Also, withdrawn student's enrollment statuses were not reported to NSLDS correctly. While interviewing the Registrar, it was noted that students who do not return after finishing the previous semester and who fill out the institutional "Notice of Intent to Not Return" form are not coded correctly in the school's internal system. These students are coded as "enrolled" students on BC's internal system; therefore these students are still showing as "Full Time" in NSLDS.

There were 3 students in the sample who withdrew from BC; however, NSLDS showed them as "Full Time."

Student #2 last attended the Spring 2014 term and did not return to BC. The student completed the "Notice of Intent Not to Return" form on 3/17/14 and informed the institution that she would not return for the Fall 2014 semester. However, NSLDS shows the student's enrollment status as "Full Time" with a certification date of 5/6/2014.

Student #19 last attended the Spring 2014 term and did not return to BC. The student completed the "Notice of Intent Not to Return" form on 5/1/14 and informed the institution that he would not return for the Fall 2014 semester. However, NSLDS shows the student's enrollment status as "Full Time" with a certification date of 5/6/2014.

Student #30 last attended the Spring 2014 term and did not return to BC. The reviewers did not locate a "Notice of Intent Not to Return" form in the student's form. However, NSLDS shows the student's enrollment status as "Full Time" with a certification date of 5/6/2014.

Also, there was one student who appeared to have graduated, but the NSLDS enrollment status indicated that the student had withdrawn.

Student #8 last attended the Summer 2013 term and did not return to BC. The student's transcript showed a degree date of 9/16/13 and there is a signed "Request to Participate as a Summer Candidate Commencement Exercises" form in the student's file. However, NSLDS showed that the student's enrollment status was "Withdrawn" with a certification date of 9/4/2013.

Required Action: BC was required to ascertain why certification dates provided to the National Student Clearinghouse and/or NSLDS did not appear as timely in NSLDS. In its response, BC was required to explain how corrections will be made to ensure student enrollment data is timely reported to NSLDS in the future. This documentation was to be provided to this office with BC's response to this finding.

BC was also required to correct the NSLDS statuses of the students listed above (student #2, #8, #19, #30) and review all of the 2012-2013 and 2013-2014 Federal Direct Student Loan recipients who have withdrawn and determine if the correct enrollments status has been reported for the student. BC was also required to revise its procedures to ensure that a student who does not return is correctly reported to NSLDS as a withdrawn student.

BC's Response: BC states that the college has updated end of term procedures in the Registrar's office to include a report to be sent to the National Student Clearinghouse indicating a status of withdrawn for student who made official notice of their plans not to return by completing the "Notice of Intent to Not Return" form. BC corrected the enrollment statuses of the students listed above (student #2, #8, #19). For student #30, BC stated that there was no correction necessary based on the student not completing a "Notice of Intent to Not Return" form (Appendix E). BC submitted the file review all of the 2012-2013 and 2013-2014 Federal Direct Student Loan recipients who had withdrawn.

Final Determination: BC did not timely nor accurately report enrollment statuses to NSLDS. For the sample students listed above (student #2, #8, #19), BC corrected the students enrollment status, which was either late or incorrect. BC also submitted the updated procedures along with the file review all of the 2012-2013 and 2013-2014 Federal Direct Student Loan recipients who had withdrawn (Appendix C). This file review determined that incorrect enrollments statuses had been reported for 79 withdrawn students. The file review also determined enrollment statuses were reported late for 186 withdrawn students.

BC is reminded that the accuracy of enrollment reporting by schools is critical for many reasons, including ensuring that the obligations and benefits that the HEA provides for Title IV student loan recipients are respected. BC is ultimately responsible for timely and accurate reporting for all students (including withdrawn students) must adhere to 34 C.F.R. § 685.309 in the future.

Findings with Final Determinations

Finding 1: Satisfactory Academic Progress Policy Inadequate

Citation: 34 C.F.R. § 668.16 of the Student Assistance General Provisions regulations stipulates, in part, that an institution must establish, publish and apply reasonable

standards for measuring whether a student, who is otherwise eligible for aid under any Title IV program is maintaining satisfactory academic progress (SAP) in his or her course of study. The standards for a student enrolled in an eligible program who is to receive assistance under a Title IV program are to be the same as or stricter than the institution's standards for a student enrolled in the same academic program who is not receiving assistance under a Title IV program. Your policy must explain how grade point average (GPA) and pace of completion are affected by course incompletes, withdrawals, repetitions and transfer credits from other schools.

All schools can have financial aid probation in their satisfactory progress policy. When a student loses FSA eligibility because he failed to make satisfactory progress, he may appeal that result on the basis of: his injury or illness, the death of a relative, or other special circumstances. His appeal must explain why he failed to make satisfactory progress and what has changed in his situation that will allow him to make satisfactory progress at the next evaluation. You can grant his appeal and put him on probation if you determine that he should be able to meet the standards after the subsequent payment period or if you develop an academic plan that when followed will ensure that he will meet the standards by a specific time. Students who fail the satisfactory progress check after the end of the payment period may only continue to receive aid if they successfully appeal, you develop an academic plan for them and they are meeting the requirements.

Federal Register, October 29, 2010

Your policy must also specify the quantitative standard (pace) at which students must progress through their program to ensure that they will graduate within the maximum timeframe, and each academic progress check must measure this. You calculate the pace at which a student is progressing by dividing the total number of hours the student has successfully completed by the total number he has attempted. You may include, but aren't required to include, remedial courses when making the quantitative assessment. For an undergraduate program measured in credit hours, a period must be no longer than 150 percent of the published length of the program.

Federal Student Handbook, Volume 1, 1:9-10

Noncompliance: *BC does not have a Title IV SAP policy. Title IV students are measured against BC's institutional SAP policy. BC's institutional SAP policy does not meet the Title IV standards. The SAP policy does not include certain components (incompletes, withdrawals, transfer credits, pass/fail courses, repeat courses and completion rate), and does not reflect the new requirements contained in the Program Integrity regulations published on October 29, 2010 and effective on July 1, 2011.*

- *The SAP policy does not explain how GPA and pace of completion are affected by course incompletes, withdrawals and transfer credits. Also, BC has a pass/fail option where students may select a total of two elective courses to be graded as pass/fail.*

The institution's SAP policy states:

"A grade of P does not affect a student's grade point average but the course credits do count towards graduation."

BC's SAP policy does not assign a numerical grade for these classes, therefore, for Title IV purposes, the Financial Aid office would not be able to determine whether a student, who is otherwise eligible for aid under any Title IV program is maintaining SAP in his or her course of study.

- *The repeating courses policy for SAP is inadequate. The institution's repeat course policy states:*

"The grade earned on the earlier attempt of the course will be removed from the calculation in the cumulative grade point average, and the hours earned in the course will be removed".

For Title IV purposes, BC must calculate the pace at which a student is progressing by dividing the total number of hours the student has successfully completed by the total number he has attempted. Course repetitions count toward courses attempted, thereby also affecting the quantitative measure.

- *The SAP policy's maximum completion rate does not meet the SAP 150% pace standards.*

The SAP policy states:

"Students will be eligible to receive institutional financial aid up to a maximum of 10 semesters"

According to BC's SAP policy, a full time student should earn 124 cumulative hours after 10 semesters; however, after 10 semesters a student could still be eligible for financial aid. Pace at each evaluation point should permit a student to complete the program requirements within 150%. Due to this regulation, a BC student could be permitted to earn up to 186 hours before becoming ineligible for financial aid.

The SAP policy does not reflect the new requirements contained in the Program Integrity regulations published on October 29, 2010 and effective on July 1, 2011.

- *The SAP policy does not explain how a student must successfully appeal in order to be placed on probation.*

The institution's probation status in the SAP policy states:

"A student who was on academic warning the previous semester and failed to meet the requirements for satisfactory progress by semester's end will be placed on academic probation"

The Program Integrity regulations state that students cannot automatically be placed on probation, students who are still failing to make satisfactory progress after the warning period lose their Title IV eligibility unless they successfully appeal and are placed on probation.

- *The SAP policy's appeal process does not require students to explain why he/she failed to make satisfactory progress and what has changed in his/her situation that will allow him/her to make satisfactory progress at the next evaluation.*

The institution's appeal procedures state that the appeal process is for students who are academically suspended from BC. The policy requires that the appeal be written but does not address the content requirements.

Additionally, please note that Title IV regulations make no provision for the concept of academic amnesty or academic renewal (BC's academic forgiveness policy). Therefore, a school must always include courses applicable to a student's major (whenever taken) in evaluating a student's SAP.

Required Action: *BC was required to revise its SAP procedures to adhere to 34 C.F.R. § 668.16 and the Program Integrity regulations published on October 29, 2010 and effective on July 1, 2011. The suggested new SAP procedures were to be provided to Angelique James **within 30 days** of the Institution's receipt of the Program Review Report. Once the new SAP procedures were approved, BC was required to apply these new procedures to all Title IV recipients for the 2012/2013, 2013/2014 and 2014/2015 (present date) award years to identify all students who failed to meet the new SAP quantitative and qualitative requirements.*

BC's Response: *In its response, BC included a copy of the new financial aid SAP policy that was approved by the Department on 1/7/2015. BC also submitted the required file review for all Title IV recipients for the 2012/2013, 2013/2014 and 2014/2015 (present date) award years who failed to meet SAP requirements.*

Final Determination: *BC did not have a Title IV SAP policy and therefore did not properly apply reasonable standards for measuring whether a student, who was otherwise eligible for aid under a Title IV program, was maintaining SAP in his or her course of study. BC created its SAP policy and corrected all non-compliances cited above in the previous academic SAP policy. BC applied the new SAP policy to all Title IV recipients for the 2012/2013, 2013/2014 and 2014/2015 (present date) award years (Appendix B) to identify all students who failed to meet the corrected SAP quantitative and qualitative*

requirements. The liability from the file review for Finding 1 is \$6,632 (not including cost of funds).

The estimated actual loss for the ineligible loans is based on BC's most recent cohort default rate available. As a result, the estimated actual loss that BC must pay to the Department for the ineligible loans is \$157. A copy of the results of that calculation is included as Appendix H.

Note: Any additional costs to the Department, including interest, special allowances, cost of funds, unearned administrative cost allowance, etc., are not included in individual findings, but instead are included in the summary of liabilities table in Section D of the report.

Estimated Actual Loss (EAL):

In lieu of requiring the institution to assume the risk of default by purchasing the ineligible loan from the holder, the Department has asserted a liability not for the loan amount, but rather for the estimated actual or potential loss that the government may incur with respect to the ineligible loan or loan amount. The estimated actual loss to the Department that has resulted or will result from those ineligible loans is based on BC's most recent cohort default rate available (Appendix G).

D. Summary of Liabilities

The total amount calculated as liabilities from the findings in the program review determination is as follows.

Liabilities	Pell (Closed Award Year)	DL EAL	Total
Finding 1	\$6,632		
Subtotal	\$6,632		
Interest/SA	\$146		
TOTAL	\$6,778		
Payable To:			Totals
Department	\$6,778	\$157	\$6,935
Grand Total			\$6,935

E. Payment Instructions

1. Liabilities Owed to the Department

BC owes to the Department **\$6,935**. Payment must be made by forwarding a check made payable to the "U.S. Department of Education" to the following address within 45 days of the date of this letter:

U.S. Department of Education
P.O. Box 979026
St. Louis, MO 63197-9000

Remit checks only. Do not send correspondence to this address.

Payment must be made via check and sent to the above Post Office Box. Payment and/or adjustments made via G5 will not be accepted as payment of this liability. Instead, the school must first make any required adjustments in COD as required by the applicable finding(s) and Section II – Instructions by Title IV, HEA Program (below), remit payment, and upon receipt of payment the Department will apply the funds to the appropriate G5 award (if necessary).

The following identification data must be provided with the payment:

Amount: \$6,935
DUNS: 081427635
TIN: 560532297
Program Review Control Number: 2014-4-04-28773

Terms of Payment

As a result of this final determination, the Department has created a receivable for this liability and payment must be received by the Department within **45 days of the date of this letter**. If payment is not received within the 45-day period, interest will accrue in monthly increments from the date of this determination, on the amounts owed to the Department, at the current value of funds rate in effect as established by the Treasury Department, until the date of receipt of the payment. BC is also responsible for repaying any interest that accrues. If you have any questions regarding interest accruals or payment credits, contact the Department's Accounts Receivable Group at (202) 245-8080 and ask to speak to BC's account representative.

If full payment cannot be made within **45 days** of the date of this letter, contact the Department's Accounts Receivable Group to apply for a payment plan. Interest charges and other conditions apply. Written request may be sent to:

U.S. Department of Education
OCFO Financial Management Operations
Accounts Receivable Group
550 12th Street, S.W., Room 6114
Washington, DC 20202-4461

If within 45 days of the date of this letter, BC has neither made payment in accordance with these instructions nor entered into an arrangement to repay the liability under terms satisfactory to the Department, the Department intends to collect the amount due and payable by administrative offset against payments due BC from the Federal Government. **BC may object to the collection by offset only by challenging the existence or amount of the debt.** To challenge the debt, BC must **timely appeal** this determination under the procedures described in the "Appeal Procedures" section of the cover letter. The Department will use those procedures to consider any objection to offset. **No separate appeal opportunity will be provided.** If a timely appeal is filed, the Department will defer offset until completion of the appeal, unless the Department determines that offset is necessary as provided at 34 C.F.R. § 30.28. This debt may also be referred to the Department of the Treasury for further action as authorized by the Debt Collection Improvement Act of 1996.

Section II – Instructions by Title IV, HEA Program

2. Liabilities Owed to the Department in the case of Title IV Grants

Pell – Closed Award Year

Finding: 1

Appendix: B

BC must repay:

Pell Closed Award Year			
Amount (Principal)	Amount (Interest)	Title IV Grant	Award Year
\$4,175	\$109	Pell	2012-2013
\$2,457	\$37	Pell	2013-2014
Total Principal	Total Interest		
\$6,632	\$146		

The disbursement record for each student identified in the Appendix B to the applicable findings must be adjusted in the Common Origination and Disbursement (COD) system based on the recalculated amount identified in the Appendix B.

Adjustments in COD must be completed prior to remitting payment to the Department. Payment cannot be accepted via G5. Once the Department receives

payment via check, the Department will apply the principal payment to the applicable G5 award. The interest will be applied to the general program account.

A copy of the adjustment to each student's COD record must be sent to Angelique James within 45 days of the date of this letter.

3. Direct Loan Estimated Actual Loss

Finding: 1

Appendix: H

DL Estimated Actual Loss	
Amount	Award Year
\$157	2012-2013
Total	
\$157	

BC must pay the amount reflected above in Direct Loan estimated loss liabilities for the award years reflected above. The liabilities will be applied to the general Direct Loan fund. This amount is also reflected in the total amount owed to the Department in Section 1 above.

4. Campus Based Programs - Perkins

Finding: 1

Appendix: B

Student #5 received \$1,500 in ineligible Perkins funds for Finding 1; however due to the student currently being in a repayment status for the Perkins loan and the minimal amount of the ineligible funds, the Department will not assess a liability for this amount at this time.

F. Appendices

Appendix A: Student Sample

Brevard College

OPE ID 002912

Student #	Award Year	SSN last 4#	Last Name	First Name
1	2012/2013			
2	2012/2013			
3	2012/2013			
4	2012/2013			
5	2012/2013			
6	2012/2013			
7	2012/2013			
8	2012/2013			
9	2012/2013			
10	2012/2013			
11	2012/2013			
12	2012/2013			
13	2012/2013			
14	2012/2013			
15	2012/2013			
16	2013/2014			
17	2013/2014			
18	2013/2014			
19	2013/2014			
20	2013/2014			
21	2013/2014			
22	2013/2014			
23	2013/2014			
24	2013/2014			
25	2013/2014			
26	2013/2014			
27	2013/2014			
28	2013/2014			
29	2013/2014			
30	2013/2014			

Confidential - This document contains Personally Identifiable Information

Award Year 2012-2013

Award Year 2012-2013												
Student #	Full Name (Last, First)	Social Security Number	SAP Session	SAP Year	Aid Year	Aid Session Code	Aid Code	Aid Description	Approved Appeal Y/N	Aid Amount		
1			SP	2012	2012	FA	DIRU	Direct Unsub Loan	N	\$1,863.00		
					2013	SP	DIRU	Direct Unsub Loan		\$0.00		
2			SP	2012	2012	FA	DIRS	Direct Sub Loan	N	\$2,250.00		
					2012		PELL	Federal Pell Grant		\$2,775.00		
					2012		DIRU	Direct Unsub Loan		\$2,650.00		
					2013	SP	DIRS	Direct Sub Loan		\$0.00		
					2013		DIRU	Direct Unsub Loan		\$0.00		
3			SP	2012	2012	FA	DIRS	Direct Sub Loan	N	\$2,250.00		
					2012		DIRU	Direct Unsub Loan		\$3,000.00		
					2012		PELL	Federal Pell Grant		\$1,400.00		
									Total Pell Grant	\$4,175.00		
									Total Sub Loan	\$4,500.00		
									Total Unsub Loan	\$7,513.00		
4					SP	2013	2013	FA	DIRS	Direct Sub Loan	N	\$0.00
							2013		DIRU	Direct Unsub Loan		\$0.00
					2013		PELL	Federal Pell Grant		\$2,457.00		
5			SP	2013	2013	FA	DIRS	Direct Sub Loan	N	\$1,750.00		
					2013		DIRU	Direct Unsub Loan		\$3,000.00		
					2013		PERK	*Federal Perkins Loan		\$1,500.00		
					2014	SP	DIRS	Direct Sub Loan		\$0.00		
					2014		DIRU	Direct Unsub Loan		\$0.00		
									Total Pell Grant	\$2,457.00		
									Total Sub Loan	\$1,750.00		
									Total Unsub Loan	\$3,000.00		

*Note: Federal Perkins Loan
is not included in the total
liability

Appendix C: Student Specific - NSLDS - Inaccurate Reporting

Student Last Name	Student First name	Social Security Number	Award Year	Withdrawal Date	Original Enrollment Status Reported to NSLDS	# of Days reported enrollment status	Date Reported to NSLDS	Original Enrollement Status Correct (Y/N)	Corrected Enrollment Status Reported to NSLDS	Corrected Date Reported to NSLDS
			1213	05/06/13	4/29/2013	149	9/25/2013	N	1/29/2015	05/06/13
			1213	05/06/13	4/29/2013	149	9/25/2013	N	1/29/2015	05/06/13
			1213	05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13
			1213	10/29/12	10/30/2012	14	11/13/2012	N	1/29/2015	10/29/12
			1213	05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13
			1213	05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13
			1213	05/06/13	4/29/2013	149	9/25/2013	N	1/29/2015	05/06/13
			1213	05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13
			1213	05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13
			1213	05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13
			1213	05/06/13	4/29/2013	149	9/25/2013	N	1/29/2015	05/06/13
			1213	05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13
			1213	05/06/13	4/29/2013	149	9/25/2013	N	1/29/2015	05/06/13
			1213	05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13
			1213	05/06/13	4/29/2013	149	9/25/2013	N	1/29/2015	05/06/13
			1213	05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13
			1213	05/06/13	4/29/2013	149	9/25/2013	N	1/29/2015	05/06/13
			1213	05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13
			1213	05/06/13	4/29/2013	149	9/25/2013	N	1/29/2015	05/06/13
			1213	05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13
			1213	05/06/13	4/29/2013	149	9/25/2013	N	1/29/2015	05/06/13
			1213	05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13
			1213	05/06/13	4/29/2013	149	9/25/2013	N	1/29/2015	05/06/13
			1213	05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13
			1213	05/06/13	4/29/2013	149	9/25/2013	N	1/29/2015	05/06/13
			1213	05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13
			1213	05/06/13	4/29/2013	149	9/25/2013	N	1/29/2015	05/06/13
			1213	05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13
			1213	05/06/13	4/29/2013	149	9/25/2013	N	1/29/2015	05/06/13
			1213	05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13
			1213	05/06/13	4/29/2013	149	9/25/2013	N	1/29/2015	05/06/13
			1213	05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13
			1213	05/06/13	4/29/2013	149	9/25/2013	N	1/29/2015	05/06/13
		1213	05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13	
		1213	05/06/13	4/29/2013	149	9/25/2013	N	1/29/2015	05/06/13	
		1213	05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13	
		1213	05/06/13	4/29/2013	149	9/25/2013	N	1/29/2015	05/06/13	
		1213	05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13	
		1213	05/06/13	4/29/2013	149	9/25/2013	N	1/29/2015	05/06/13	
		1213	05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13	
		1213	05/06/13	4/29/2013	149	9/25/2013	N	1/29/2015	05/06/13	
		1213	05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13	
		1213	05/06/13	4/29/2013	149	9/25/2013	N	1/29/2015	05/06/13	
		1213	05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13	
		1213	05/06/13	4/29/2013	149	9/25/2013	N	1/29/2015	05/06/13	
		1213	05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13	
		1213	05/06/13	4/29/2013	149	9/25/2013	N	1/29/2015	05/06/13	
		1213	05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13	
		1213	05/06/13	4/29/2013	149	9/25/2013	N	1/29/2015	05/06/13	
		1213	05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13	
		1213	05/06/13	4/29/2013	149	9/25/2013	N	1/29/2015	05/06/13	
		1213	05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13	
		1213	05/06/13	4/29/2013	149	9/25/2013	N	1/29/2015	05/06/13	
		1213	05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13	
		1213	05/06/13	4/29/2013	149	9/25/2013	N	1/29/2015	05/06/13	
		1213	05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13	
		1213	05/06/13	4/29/2013	149	9/25/2013	N	1/29/2015	05/06/13	
		1213	05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13	
		1213	05/06/13	4/29/2013	149	9/25/2013	N	1/29/2015	05/06/13	
		1213	05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13	
		1213	05/06/13	4/29/2013	149	9/25/2013	N	1/29/2015	05/06/13	
		1213	05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13	
		1213	05/06/13	4/29/2013	149	9/25/2013	N	1/29/2015	05/06/13	
		1213	05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13	
		1213	05/06/13	4/29/2013	149	9/25/2013	N	1/29/2015	05/06/13	
		1213	05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13	
		1213	05/06/13	4/29/2013	149	9/25/2013	N	1/29/2015	05/06/13	
		1213	05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13	
		1213	05/06/13	4/29/2013	149	9/25/2013	N	1/29/2015	05/06/13	
		1213	05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13	
		1213	05/06/13	4/29/2013	149	9/25/2013	N	1/29/2015	05/06/13	
		1213	05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13	
		1213	05/06/13	4/29/2013	149	9/25/2013	N	1/29/2015	05/06/13	
		1213	05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13	
		1213	05/06/13	4/29/2013	149	9/25/2013	N	1/29/2015	05/06/13	
		1213	05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13	
		1213	05/06/13	4/29/2013	149	9/25/2013	N	1/29/2015	05/06/13	
		1213	05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13	
		1213	05/06/13	4/29/2013	149	9/25/2013	N	1/29/2015	05/06/13	
		1213	05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13	
		1213	05/06/13	4/29/2013	149	9/25/2013	N	1/29/2015	05/06/13	
		1213	05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13	
		1213	05/06/13	4/29/2013	149	9/25/2013	N	1/29/2015	05/06/13	
		1213	05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13	
		1213	05/06/13	4/29/2013	149	9/25/2013	N	1/29/2015	05/06/13	
		1213	05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13	
		1213	05/06/13	4/29/2013	149	9/25/2013	N	1/29/2015	05/06/13	
		1213	05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13	
		1213	05/06/13	4/29/2013	149	9/25/2013	N	1/29/2015	05/06/13	
		1213	05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13	
		1213	05/06/13	4/29/2013	149	9/25/2013	N	1/29/2015	05/06/13	
		1213	05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13	
		1213	05/06/13	4/29/2013	149	9/25/2013	N	1/29/2015	05/06/13	
		1213	05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13	
		1213	05/06/13	4/29/2013	149	9/25/2013	N	1/29/2015	05/06/13	
		1213	05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13	
		1213	05/06/13	4/29/2013	149	9/25/2013	N	1/29/2015	05/06/13	
		1213	05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13	
		1213	05/06/13	4/29/2013	149	9/25/2013	N	1/29/2015	05/06/13	
		1213	05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13	
		1213	05/06/13	4/29/2013	149	9/25/2013	N	1/29/2015	05/06/13	
		1213	05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13	
		1213	05/06/13	4/29/2013	149	9/25/2013	N	1/29/2015	05/06/13	
		1213	05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13	
		1213	05/06/13	4/29/2013	149	9/25/2013	N	1/29/2015	05/06/13	
		1213	05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13	
		1213	05/06/13	4/29/2013	149	9/25/2013	N	1/29/2015	05/06/13	
		1213	05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13	
		1213	05/06/13	4/29/2013	149	9/25/2013	N	1/29/2015	05/06/13	
		1213	05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13	
		1213	05/06/13	4/29/2013	149	9/25/2013	N	1/29/2015	05/06/13	
		1213	05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13	
		1213	05/06/13	4/29/2013	149	9/25/2013	N	1/29/2015	05/06/13	
		1213	05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13	
		1213	05/06/13	4/29/2013	149	9/25/2013	N	1/29/2015	05/06/13	
		1213	05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13	
		1213	05/06/13	4/29/2013	149	9/25/2013	N	1/29/2015	05/06/13	
		1213	05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13	
		1213	05/06/13	4/29/2013	149	9/25/2013	N	1/29/2015	05/06/13	
		1213	05/06/13	4/29/2013	179	10				

Appendix C: Student Specific - NSLDS - Inaccurate Reporting

[illegible]

Student Last Name	Student First name	Social Security Number	Award Year	Withdrawal Date	Original Enrollment Status Reported to NSLDS	# of Days reported enrollment status	Date Reported to NSLDS	Original Enrollment Status Correct (Y/N)	Corrected Enrollment Status Reported to NSLDS	Corrected Date Reported to NSLDS
			1213	05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13
			1213	05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13
			1213	05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13
			1213	05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13
			1213	05/06/13	4/29/2013	149	9/25/2013	N	1/29/2015	05/06/13

Student Last Name	Student First name	Social Security Number	Award Year	Withdrawal Date	Original Enrollment Status Reported to NSLDS	# of Days reported enrollment status	Date Reported to NSLDS	Original Enrollement Status Correct (Y/N)	Corrected Enrollment Status Reported to NSLDS	Corrected Date Reported to NSLDS
			1314	05/01/14	5/1/2014	167	10/15/2014	Y		
			1314	05/01/14	5/1/2014	167	10/15/2014	Y		
			1314	05/01/14	5/1/2014	167	10/15/2014	Y		
			1213	05/06/13	4/29/2013	149	9/25/2013	N	1/29/2015	05/06/13
			1314	05/01/14	5/1/2014	167	10/15/2014	Y		
			1213	05/06/13	4/29/2013	149	9/25/2013	N	1/29/2015	05/06/13
			1314	05/01/14	5/1/2014	167	10/15/2014	Y		
			1314	05/01/14	5/1/2014	167	10/15/2014	Y		
			1314	05/01/14	5/1/2014	167	10/15/2014	Y		
			1314	05/01/14	5/1/2014	167	10/15/2014	Y		
			1314	12/13/13	12/13/2013	70	2/21/2014	Y		
			1314	05/01/14	5/1/2014	167	10/15/2014	Y		
			1314	05/01/14	5/1/2014	167	10/15/2014	Y		
			1314	05/01/14	5/1/2014	167	10/15/2014	Y		
			1213	12/18/12	12/18/2012	66	2/22/2013	Y		
			1314	05/01/14	5/1/2014	167	10/15/2014	Y		
			1213	05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13
			1213	05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13
			1213	05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13
			1213	05/06/13	4/29/2013	149	9/25/2013	N	1/29/2015	05/06/13
			1314	05/01/14	5/1/2014	167	10/15/2014	Y		
			1314	05/01/14	5/1/2014	167	10/15/2014	Y		
			1213	05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13
			1314	05/01/14	5/1/2014	167	10/15/2014	Y		
			1213	05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13
			1213	05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13
			1213	05/06/13	4/29/2013	149	9/25/2013	N	1/29/2015	05/06/13
			1213	05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13
			1314	05/01/14	5/1/2014	167	10/15/2014	Y		
			1314	12/13/13	12/13/2013	70	2/21/2014	Y		
			1213	05/06/13	4/29/2013	149	9/25/2013	N	1/29/2015	05/06/13
			1213	05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13
			1213	05/06/13	4/29/2013	149	9/25/2013	N	1/29/2015	05/06/13
			1314	05/01/14	5/1/2014	167	10/15/2014	Y		
			1314	05/01/14	5/1/2014	167	10/15/2014	Y		
			1213	05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13

Student Last Name	Student First name	Social Security Number	Award Year	Withdrawal Date	Original Enrollment Status Reported to NSLDS	# of Days reported enrollment status	Date Reported to NSLDS	Original Enrollment Status Correct (Y/N)	Corrected Enrollment Status Reported to NSLDS	Corrected Date Reported to NSLDS
				05/06/13	4/29/2013	149	9/25/2013	N	1/29/2015	05/06/13
				05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13
				05/01/14	5/1/2014	167	10/15/2014	Y		
				05/01/14	5/1/2014	167	10/15/2014	Y		
				05/06/13	4/29/2013	149	9/25/2013	N	1/29/2015	05/06/13
				05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13
				05/06/13	4/29/2013	149	9/25/2013	N	1/29/2015	05/06/13
				05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13
				05/01/14	5/1/2014	167	10/15/2014	Y		
				08/20/13	8/20/2013	66	10/25/2013	Y		
				05/01/14	5/1/2014	167	10/15/2014	Y		
				05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13
				05/01/14	5/1/2014	167	10/15/2014	Y		
				05/01/14	5/1/2014	167	10/15/2014	Y		
				05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13
				05/01/14	5/1/2014	167	10/15/2014	Y		
				05/01/14	5/1/2014	167	10/15/2014	Y		
				05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13
				12/13/13	12/13/2013	70	2/21/2014	Y		
				05/01/14	5/1/2014	167	10/15/2014	Y		
				05/01/14	5/1/2014	167	10/15/2014	Y		
				05/01/14	5/1/2014	167	10/15/2014	Y		
				05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13
				05/01/14	5/1/2014	167	10/15/2014	Y		
				05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13
				05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13
				05/06/13	4/29/2013	149	9/25/2013	N	1/29/2015	05/06/13
				05/01/14	5/1/2014	167	10/15/2014	Y		
				12/13/13	12/13/2013	70	2/21/2014	Y		
				12/13/13	12/13/2013	70	2/21/2014	Y		
				05/01/14	5/1/2014	167	10/15/2014	Y		
				12/13/13	12/13/2013	70	2/21/2014	Y		
				12/13/13	12/13/2013	70	2/21/2014	Y		
				05/01/14	5/1/2014	167	10/15/2014	Y		
				05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13
				05/01/14	5/1/2014	167	10/15/2014	Y		

Student Last Name	Student First name	Social Security Number	Award Year	Withdrawal Date	Original Enrollment Status Reported to NSLDS	# of Days reported enrollment status	Date Reported to NSLDS	Original Enrollement Status Correct (Y/N)	Corrected Enrollment Status Reported to NSLDS	Corrected Date Reported to NSLDS
				12/13/13	12/13/2013	70	2/21/2014	Y		
				05/06/13	4/29/2013	149	9/25/2013	N	1/29/2015	05/06/13
				05/01/14	5/1/2014	167	10/15/2014	Y		
				05/01/14	5/1/2014	167	10/15/2014	Y		
				12/18/12	12/18/2012	66	2/22/2013	Y		
				12/18/12	12/18/2012	66	2/22/2013	Y		
				05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13
				05/01/14	5/1/2014	167	10/15/2014	Y		
				05/01/14	5/1/2014	167	10/15/2014	Y		
				12/13/13	12/13/2013	70	2/21/2014	Y		
				05/06/13	4/29/2013	149	9/25/2013	N	1/29/2015	05/06/13
				05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13
				05/01/14	5/1/2014	167	10/15/2014	Y		
				08/22/13	8/22/2013	64	10/25/2013	Y		
				12/13/13	12/13/2013	70	2/21/2014	Y		
				12/13/13	12/13/2013	70	2/21/2014	Y		
				05/01/14	5/1/2014	167	10/15/2014	Y		
				05/06/13	4/29/2013	149	9/25/2013	N	1/29/2015	05/06/13
				05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13
				12/13/13	12/13/2013	70	2/21/2014	Y		
				05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13
				05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13
				05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13
				12/18/12	12/18/2012	66	2/22/2013	Y		
				05/06/13	4/29/2013	149	9/25/2013	N	1/29/2015	05/06/13
				12/18/12	12/18/2012	66	2/22/2013	Y		
				05/01/14	5/1/2014	167	10/15/2014	Y		
				12/18/12	12/18/2012	66	2/22/2013	Y		
				05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13
				05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13
				12/18/12	12/18/2012	66	2/22/2013	Y		
				05/01/14	5/1/2014	167	10/15/2014	Y		
				05/06/13	4/29/2013	149	9/25/2013	N	1/29/2015	05/06/13
				05/01/14	5/1/2014	167	10/15/2014	Y		
				05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13
				05/01/14	5/1/2014	167	10/15/2014	Y		

Student Last Name	Student First name	Social Security Number	Award Year	Withdrawal Date	Original Enrollment Status Reported to NSLDS	# of Days reported enrollment status	Date Reported to NSLDS	Original Enrollement Status Correct (Y/N)	Corrected Enrollment Status Reported to NSLDS	Corrected Date Reported to NSLDS
				05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13
				05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13
				05/06/13	4/29/2013	149	9/25/2013	N	1/29/2015	05/06/13
				05/01/14	5/1/2014	167	10/15/2014	Y		
				05/01/14	5/1/2014	167	10/15/2014	Y		
				05/01/14	5/1/2014	167	10/15/2014	Y		
				05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13
				05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13
				05/01/14	5/1/2014	167	10/15/2014	Y		
				05/01/14	5/1/2014	167	10/15/2014	Y		
				05/06/13	4/29/2013	149	9/25/2013	N	1/29/2015	05/06/13
				05/01/14	5/1/2014	167	10/15/2014	Y		
				05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13
				05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13
				05/01/14	5/1/2014	167	10/15/2014	Y		
				05/01/14	5/1/2014	167	10/15/2014	Y		
				05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13
				05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13
				05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13
				05/01/14	5/1/2014	167	10/15/2014	Y		
				05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13
				05/01/14	5/1/2014	167	10/15/2014	Y		
				05/01/14	5/1/2014	167	10/15/2014	Y		
				05/01/14	5/1/2014	167	10/15/2014	Y		
				05/01/14	5/1/2014	167	10/15/2014	Y		
				05/01/14	5/1/2014	167	10/15/2014	Y		
				05/01/14	5/1/2014	167	10/15/2014	Y		
				05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13
				05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13
				05/01/14	5/1/2014	167	10/15/2014	Y		
				05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13
				05/01/14	5/1/2014	167	10/15/2014	Y		
				05/01/14	5/1/2014	167	10/15/2014	Y		
				05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13
				09/03/12	9/3/2012	78	11/20/2012	Y		
				05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13

Student Last Name	Student First name	Social Security Number	Award Year	Withdrawal Date	Original Enrollment Status Reported to NSLDS	# of Days reported enrollment status	Date Reported to NSLDS	Original Enrollement Status Correct (Y/N)	Corrected Enrollment Status Reported to NSLDS	Corrected Date Reported to NSLDS
				05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13
				05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13
				05/06/13	4/29/2013	149	9/25/2013	N	1/29/2015	05/06/13
				05/01/14	5/1/2014	167	10/15/2014	Y		
				05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13
				05/01/14	5/1/2014	167	10/15/2014	Y		
				05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13
				05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13
				05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13
				05/01/14	5/1/2014	167	10/15/2014	Y		
				05/01/14	5/1/2014	167	10/15/2014	Y		
				05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13
				05/01/14	5/1/2014	167	10/15/2014	Y		
				05/06/13	4/29/2013	149	9/25/2013	N	1/29/2015	05/06/13
				12/13/13	12/13/2013	70	2/21/2014	Y		
				05/01/14	5/1/2014	167	10/15/2014	Y		
				12/13/13	12/13/2013	70	2/21/2014	Y		
				12/18/12	12/18/2012	66	2/22/2013	Y		
				05/01/14	5/1/2014	167	10/15/2014	Y		
				05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13
				05/01/14	5/1/2014	167	10/15/2014	Y		
				05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13
				12/13/13	12/13/2013	70	2/21/2014	Y		
				12/18/12	12/18/2012	66	2/22/2013	Y		
				05/01/14	5/1/2014	167	10/15/2014	Y		
				05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13
				05/01/14	5/1/2014	167	10/15/2014	Y		
				05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13
				12/13/13	12/13/2013	70	2/21/2014	Y		
				12/18/12	12/18/2012	66	2/22/2013	Y		
				05/01/14	5/1/2014	167	10/15/2014	Y		
				05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13
				05/01/14	5/1/2014	167	10/15/2014	Y		
				05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13
				12/13/13	12/13/2013	70	2/21/2014	Y		
				12/18/12	12/18/2012	66	2/22/2013	Y		
				05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13
				12/18/12	12/18/2012	66	2/22/2013	Y		
				05/06/13	4/29/2013	179	10/25/2013	N	1/29/2015	05/06/13
				05/01/14	5/1/2014	167	10/15/2014	Y		
				05/06/13	4/29/2013	149	9/25/2013	N	1/29/2015	05/06/13
				12/18/12	12/18/2012	66	2/22/2013	Y		

Brevarad College OPEID: 002912

Appendix C: Student Specific - NSLDS - Late Reporting

Student Last Name	Student First name	Social Security Number	Award Year	Withdrawal Date	Original Enrollment Status Reported to NSLDS	# of Days reported enrollment status	Date Reported to NSLDS	Original Enrollement Status Correct (Y/N)	Corrected Enrollment Status Reported to NSLDS	Corrected Date Reported to NSLDS
			1314	05/01/14	5/1/2014	167	10/15/2014	Y		
			1213	12/18/12	12/18/2012	66	2/22/2013	Y		
			1213	12/18/12	12/18/2012	66	2/22/2013	Y		
			1314	05/01/14	5/1/2014	167	10/15/2014	Y		
			1213	12/18/12	12/18/2012	66	2/22/2013	Y		
			1314	12/13/13	12/13/2013	70	2/21/2014	Y		

Appendix D: Program Review Report



October 21, 2014

Dr. David C. Joyce
President

UPS Tracking No. 1ZA879640290524267

Brevard College
1 Brevard College Drive
Brevard, NC 28712-3306

RE: **Program Review Report**
OPE ID: 002912
PRCN: 2014-4-04-28773

Dear Dr. Joyce:

From August 25, 2014 through August 29, 2014, Angelique James conducted a review of Brevard College's (BC's) administration of the programs authorized pursuant to Title IV of the Higher Education Act of 1965, as amended, 20 U.S.C. §§ 1070 et seq. (Title IV, HEA programs). The findings of that review are presented in the enclosed report.

Findings of noncompliance are referenced to the applicable statutes and regulations and specify the action required to comply with the statute and regulations. Please review the report and respond to each finding, indicating the corrective actions taken by BC. The response should include a brief, written narrative for each finding that clearly states BC's position regarding the finding and the corrective action taken to resolve the finding. Separate from the written narrative, BC must provide supporting documentation as required in each finding.

Please note that pursuant to HEA section 498A(b), the Department is required to:

- (1) provide to the institution an adequate opportunity to review and respond to any preliminary program review report¹ and relevant materials related to the report before any final program review report is issued;
- (2) review and take into consideration an institution's response in any final program review report or audit determination, and include in the report or determination –
 - a. A written statement addressing the institution's response;
 - b. A written statement of the basis for such report or determination; and
 - c. A copy of the institution's response.

The Department considers the institution's response to be the written narrative (to include e-mail communication). Any supporting documentation submitted with the institution's written

¹ A "preliminary" program review report is the program review report. The Department's final program review report is the Final Program Review Determination (FPRD).

Brevard College
OPE ID Number: 002912
PRCN Number: 2014-4-04-28773
Page 2 of 2

response will not be attached to the FPRD. However, it will be retained and available for inspection by BC upon request. Copies of the program review report, the institution's response, and any supporting documentation may be subject to release under the Freedom of Information Act (FOIA) and can be provided to other oversight entities after the FPRD is issued.

The institution's response should be sent by mail directly to Angelique James or by email at angelique.james@ed.gov **within 60 calendar days** of receipt of this letter.

Protection of Personally Identifiable Information (PII):


PII is any information about an individual which can be used to distinguish or trace an individual's identity (some examples are name, social security number, date and place of birth). The loss of PII can result in substantial harm, embarrassment, and inconvenience to individuals and may lead to identity theft or other fraudulent use of the information. Student numbers were assigned in Appendix A, Student Sample. Please see the enclosure Protection of Personally Identifiable Information for instructions regarding submission to the Department of required data / documents containing PII.

Record Retention:

Program records relating to the period covered by the program review must be retained until the later of: resolution of the loans, claims or expenditures questioned in the program review; or the end of the retention period otherwise applicable to the record under 34 C.F.R. § 668.24(e).

We would like to express our appreciation for the courtesy and cooperation extended during the review. Please refer to the above Program Review Control Number (PRCN) in all correspondence relating to this report. If you have any questions concerning this report, please contact Angelique James at 404-974-9441 or angelique.james@ed.gov.

Sincerely,


David Smittick
Compliance Manager

cc: Caron O. Surrent, Financial Aid Administrator

Enclosure:
Protection of Personally Identifiable Information

Prepared for
Brevard College

Federal Student Aid
An OFFICE of the U.S. DEPARTMENT of EDUCATION

PROUD SPONSOR of
the AMERICAN MIND™

OPE ID 002912
PRCN 2014-4-04-28773

Prepared by
U.S. Department of Education
Federal Student Aid
School Participation Division-Atlanta

Program Review Report

October 21, 2014

Federal Student Aid, School Participation Division - Atlanta
61 Forsyth Street SW, Room 18T40, Atlanta, GA 30303
www.FederalStudentAid.ed.gov

Federal Student Aid
An OFFICE of the U.S. DEPARTMENT of EDUCATION

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A. Institutional Information

Brevard College
1 Brevard College Drive
Brevard, NC 28712-3306

Type: Private, Nonprofit

Highest Level of Offering: Bachelor's Degree

Accrediting Agency: Southern Association of Colleges and Schools Commission on Colleges

Current Student Enrollment: 633 (2012/2013)

% of Students Receiving Title IV: 73.4% (2012/2013)

Title IV Participation: Postsecondary Education Participants System (PEPS):

2012-2013 Award Year

Federal Pell Grant Program (Pell)	\$1,098,686
Federal Supplemental Education Opportunity Grant (SEOG)	\$38,894
Federal Work Study (FWS)	\$49,716
William D. Ford Direct Loan Program (Direct Loan)	\$4,101,604

Default Rate DL:	2011	10.3%
	2010	7.2%
	2009	11.1%

B. Scope of Review

The U.S. Department of Education (the Department) conducted a program review at Brevard College (BC) from August 25, 2014 to August 29, 2014. The review was conducted by Angelique James.

Based upon an analysis of the Department's data (graduation and withdrawal data from National Student Loan Data System - NSLDS and Integrated Postsecondary Education Data System - IPEDS), the Department determined that BC had a high annual dropout rate. A random sample of 15 files was selected for review in the 2012-2013 and 2013-2014 (year to date) award years. Appendix A lists the names and partial social security numbers of the 30 students whose files were examined during the program review.

Disclaimer:

Although the review was thorough, it cannot be assumed to be all-inclusive. The absence of statements in the report concerning BC's specific practices and procedures must not be construed as acceptance, approval, or endorsement of those specific practices and procedures. Furthermore, it does not relieve BC of its obligation to comply with all of the statutory or regulatory provisions governing the Title IV, HEA programs.

This report reflects initial findings. These findings are not final. The Department will issue its final findings in a subsequent Final Program Review Determination letter.

C. Findings

During the review, several areas of noncompliance were noted. Findings of noncompliance are referenced to the applicable statutes and regulations and specify the actions to be taken by BC to bring operations of the financial aid programs into compliance with the statutes and regulations.

Finding 1: Satisfactory Academic Progress Policy Inadequate

Citation: 34 C.F.R. § 668.16 of the Student Assistance General Provisions regulations stipulates, in part, that an institution must establish, publish and apply reasonable standards for measuring whether a student, who is otherwise eligible for aid under any Title IV program is maintaining satisfactory academic progress (SAP) in his or her course of study. The standards for a student enrolled in an eligible program who is to receive assistance under a Title IV program are to be the same as or stricter than the institution's standards for a student enrolled in the same academic program who is not receiving assistance under a Title IV program. Your policy must explain how grade point average (GPA) and pace of completion are affected by course incompletes, withdrawals, repetitions and transfer credits from other schools.

All schools can have financial aid probation in their satisfactory progress policy. When a student loses FSA eligibility because he failed to make satisfactory progress, he may appeal that result on the basis of: his injury or illness, the death of a relative, or other special circumstances. His ~~appeal must explain why he failed to make satisfactory progress and what has changed in his~~ situation that will allow him to make satisfactory progress at the next evaluation. You can grant his appeal and put him on probation if you determine that he should be able to meet the standards after the subsequent payment period or if you develop an academic plan that when followed will ensure that he will meet the standards by a specific time. Students who fail the satisfactory progress check after the end of the payment period may only continue to receive aid if they successfully appeal, you develop an academic plan for them and they are meeting the requirements.

Federal Register, October 29, 2010

Your policy must also specify the *quantitative* standard (pace) at which students must progress through their program to ensure that they will graduate within the maximum timeframe, and each academic progress check must measure this. You calculate the pace at which a student is progressing by dividing the total number of hours the student has successfully completed by the total number he has attempted. You may include, but aren't required to include, remedial courses when making the quantitative assessment. For an undergraduate program measured in credit hours, a period must be no longer than 150 percent of the published length of the program.

Federal Student Handbook, Volume 1, 1:9-10

Noncompliance: BC does not have a Title IV SAP policy. Title IV students are measured against BC's institutional SAP policy. BC's institutional SAP policy does not meet the Title IV standards. The SAP policy does not include certain components (incompletes, withdrawals, transfer credits, pass/fail courses, repeat courses and completion rate), and does not reflect the new requirements contained in the Program Integrity regulations published on October 29, 2010 and effective on July 1, 2011.

- The SAP policy does not explain how GPA and pace of completion are affected by course incompletes, withdrawals and transfer credits. Also, BC has a pass/fail option where students may select a total of two elective courses to be graded as pass/fail.

The institution's SAP policy states:

"A grade of P does not affect a student's grade point average but the course credits do count towards graduation."

BC's SAP policy does not assign a numerical grade for these classes, therefore, for Title IV purposes, the Financial Aid office would not be able to determine whether a student, who is otherwise eligible for aid under any Title IV program is maintaining SAP in his or her course of study.

- The repeating courses policy for SAP is inadequate. The institution's repeat course policy states:

"The grade earned on the earlier attempt of the course will be removed from the calculation in the cumulative grade point average, and the hours earned in the course will be removed".

For Title IV purposes, BC must calculate the pace at which a student is progressing by dividing the total number of hours the student has successfully completed by the total number he has attempted. Course repetitions count toward courses attempted, thereby also affecting the quantitative measure.

- The SAP policy's maximum completion rate does not meet the SAP 150% pace standards.

The SAP policy states:

"Students will be eligible to receive institutional financial aid up to a maximum of 10 semesters"

According to BC's SAP policy, a full time student should earn 124 cumulative hours after 10 semesters; however, after 10 semesters a student could still be eligible for financial aid. Pace at each evaluation point should permit a student to complete the program requirements within 150%. Due to this regulation, a BC student could be permitted to earn up to 186 hours before becoming ineligible for financial aid.

The SAP policy does not reflect the new requirements contained in the Program Integrity regulations published on October 29, 2010 and effective on July 1, 2011.

- The SAP policy does not explain how a student must successfully appeal in order to be placed on probation.

The institution's probation status in the SAP policy states:

"A student who was on academic warning the previous semester and failed to meet the requirements for satisfactory progress by semester's end will be placed on academic probation"

The Program Integrity regulations state that students cannot automatically be placed on probation, students who are still failing to make satisfactory progress after the warning period lose their Title IV eligibility unless they successfully appeal and are placed on probation.

- The SAP policy's appeal process does not require students to explain why he/she failed to make satisfactory progress and what has changed in his/her situation that will allow him/her to make satisfactory progress at the next evaluation.

The institution's appeal procedures state that the appeal process is for students who are academically suspended from BC. The policy requires that the appeal be written but does not address the content requirements.

Additionally, please note that Title IV regulations make no provision for the concept of academic amnesty or academic renewal (BC's academic forgiveness policy). Therefore, a school must always include courses applicable to a student's major (whenever taken) in evaluating a student's SAP.

Required Action: BC must revise its SAP procedures to adhere to 34 C.F.R. § 668.16 and the Program Integrity regulations published on October 29, 2010 and effective on July 1, 2011. The new SAP procedures must be provided to this office with BC's response to this finding.

The suggested new SAP procedures must be provided to Angelique James **within 30 days** of the Institution's receipt of the Program Review Report. Ms. James will review the procedures, indicate if any changes are needed, and approve the procedures.

Once the new SAP procedures are approved, BC must apply these new procedures to all Title IV recipients for the 2012/2013, 2013/2014 and 2014/2015 (present date) award years to identify all students who failed to meet the new SAP quantitative and qualitative requirements.

In cases where students remain eligible for Title IV aid, no further action is required. However, if Title IV aid was disbursed for a term in which a student was not meeting SAP, those funds must be reported as ineligible. The institution must provide a list of all students who have failed to meet the SAP requirements for the 2012/2013, 2013/2014 and 2014/2015 (present date) award years and provide the following information on each student identified. BC must provide an excel spreadsheet to this office in the format below:

1. Student Last Name
2. Student First Name
3. SSN
4. Award Year
5. Identify each term (W11, SU12, etc.)
6. Title IV Program (Pell, Direct Loan Subsidized, Direct Loan Unsubsidized, etc.)
7. Approved Appeal (Yes/No)
8. Amount of Title IV Aid Disbursed for each term during ineligible period

Note that unless the student appealed after SAP was checked for each payment period (term), the student would no longer be eligible for financial aid and BC must return the funds.

Any liabilities for this finding will be addressed in the Final Program Review Determination (FPRD) letter.

Finding 2: Inaccurate/Late Enrollment Reporting to the National Student Loan Data System

Citation: As noted in 34 C.F.R. § 685.309, schools are required to confirm and report the enrollment status of Title IV student aid recipients to the Department's NSLDS. This process is called Enrollment Reporting (or the Student Status Confirmation Report [SSCR]). One of the important functions of NSLDS is to maintain the enrollment status of Title IV recipients. The accuracy of enrollment reporting by schools is critical for many reasons, including ensuring that the obligations and benefits that the HEA provides for Title IV student loan recipients are respected. NSLDS enrollment information is also used by the Department for a variety of other purposes, including tracking interest subsidy payments; budget allocations; and the evaluation of the Title IV programs.

The accuracy of Title IV student loan records depends on the accuracy of enrollment information reported by schools. Schools must review, update, and verify student enrollment statuses; effective dates of the enrollment status; and; the anticipated completion dates that appear on the Enrollment Reporting roster file or on the Enrollment Maintenance page of the NSLDS Web site. The certification date is the date a school certified the enrollment information.

An institution must have administrative and fiscal controls to timely report data. Upon receipt of an Enrollment Reporting roster file, the institution must complete and return that file to NSLDS within 30 days from the date the roster file was created. However, if a roster file is expected within 60 days (often referred to as batch reporting), a school may provide the updated data on that roster file. Title IV institutions must:

- Recertify enrollment status of all students on the enrollment roster even if there is no change in enrollment status.
- Provide completion/graduation data accurately and timely when students complete their academic program.
- Accurately and timely report students with a less than half-time enrollment status.
- Add transfer students who have received Title IV aid elsewhere to their enrollment roster even if the students are not receiving aid at your school.
- Provide an Anticipated Completion Date (ACD) for students.

Title IV schools are ultimately responsible for timely and accurate reporting, even when they use an enrollment reporting servicer to submit enrollment reporting files. Schools may perform internal oversight or may receive a request for an audit history of enrollment reporting. Also, NSLDS provides tools for a school to monitor certification records that have been provided to NSLDS by the school or its servicer. Schools that do not comply may have their eligibility for Title IV aid revoked, or they may have fines imposed.

Please refer to the Department's Dear Colleague Letter (DCL-GEN-12-06, March 30, 2012) for additional requirements regarding NSLDS Enrollment Reporting.

Note: On July 1, 2014, the Department began requesting enrollment information from schools every 60 days and schools are required to respond to those requests **within 15 days** of the date that the Department sent the enrollment reporting roster to the school.

Noncompliance: The certification date of enrollment status as reported in NSLDS for the majority of the students in the sample was up to several months late. It appeared that students who did not change enrollment statuses were certified multiple times after their initial certification. This multiple certification process changed their certification date each month.

Also, withdrawn student's enrollment statuses were not reported to NSLDS correctly. While interviewing the Registrar, it was noted that students who do not return after finishing the previous semester and who fill out the institutional "Notice of Intent to Not Return" form are not coded correctly in the school's internal system. These students are coded as "enrolled" students on BC's internal system; therefore these students are still showing as "Full Time" in NSLDS.

There were 3 students in the sample who withdrew from BC; however, NSLDS showed them as "Full Time."

Student #2 last attended the Spring 2014 term and did not return to BC. The student completed the "Notice of Intent Not to Return" form on 3/17/14 and informed the institution that she would not return for the Fall 2014 semester. However, NSLDS shows the student's enrollment status as "Full Time" with a certification date of 5/6/2014.

Student #19 last attended the Spring 2014 term and did not return to BC. The student completed the "Notice of Intent Not to Return" form on 5/1/14 and informed the institution that he would not return for the Fall 2014 semester. However, NSLDS shows the student's enrollment status as "Full Time" with a certification date of 5/6/2014.

Student #30 last attended the Spring 2014 term and did not return to BC. The reviewers did not locate a "Notice of Intent Not to Return" form in the student's form. However, NSLDS shows the student's enrollment status as "Full Time" with a certification date of 5/6/2014.

Also, there was one student who appeared to have graduated, but the NSLDS enrollment status indicated that the student had withdrawn.

Student #8 last attended the Summer 2013 term and did not return to BC. The student's transcript showed a degree date of 9/16/13 and there is a signed "Request to Participate as a Summer Candidate Commencement Exercises" form in the student's file. However, NSLDS

showed that the student's enrollment status was "Withdrawn" with a certification date of 9/4/2013.

Required Action: BC must ascertain why certification dates provided to the National Student Clearinghouse and/or NSLDS do not appear as timely in NSLDS. In its response, BC must explain how corrections will be made to ensure student enrollment data is timely reported to NSLDS in the future. This documentation must be provided to this office with BC's response to this finding.

BC must also correct the NSLDS statuses of the students listed above (student #2, #8, #19, #30) and provide documentation to the Department of these corrections. BC must also review all of the 2012-2013 and 2013-2014 Federal Direct Student Loan recipients who have withdrawn and determine if the correct enrollments status has been reported for the student.

In its response to this finding, BC must provide the Department with the following in an electronic Excel spreadsheet:

1. Student First Name
2. Student Last Name
3. Social Security Number
4. Award Year
5. Withdrawal Date
6. Original Enrollment Status Reported to NSLDS
7. Date Reported to NSLDS
8. Original Enrollment Status Correct (Y/N)
9. Corrected Enrollment Status Reported to NSLDS
10. Corrected Date Reported to NSLDS

BC must revise its procedures to ensure that a student who does not return is correctly reported to NSLDS as a withdrawn student. This revised policy must be submitted in response to this finding.

Finding 3: Ineligible High School Diploma/Missing High School Diploma Policy

Citation: 34 C.F.R. § 668.32, General Provisions, states that a student is eligible to receive Title IV, HEA program assistance if the student has a high school diploma or its recognized equivalent; has obtained a passing score specified by the Secretary on an independently administered test; is enrolled in an eligible institution that participates in a State "process" approved by the Secretary; or obtained a secondary school completion credential for home school (other than a high school diploma or its recognized equivalent) provided for under State law.

According to 34 C.F.R. § 600.2, the following are recognized as the equivalent of a high school diploma—

- (1) A General Education Development Certificate (GED);
- ~~(2) A State certificate received by a student after the student has passed a State-authorized examination that the State recognizes as the equivalent of a high school diploma;~~
- (3) An academic transcript of a student who has successfully completed at least a two-year program that is acceptable for full credit toward a bachelor's degree; or
- (4) For a person who is seeking enrollment in an educational program that leads to at least an associate degree or its equivalent and who has not completed high school but who excelled academically in high school, documentation that the student excelled academically in high school and has met the formalized, written policies of the institution for admitting such students 34 C.F.R. § 668.32(a)(2)(e)(1) states a student is eligible to receive Title IV, HEA program assistance if the student has a high school diploma or its recognized equivalent.

34 C.F.R. § 668.16(p) states that institutions are required to develop and apply procedures to evaluate the validity of a student's high school diploma if the institution or the Department has reason to believe that the diploma is not valid or was not obtained from an entity that provides secondary school education.

Noncompliance: BC enrolled and disbursed Title IV funds to transfer students who did not possess a high school diploma..

BC's admission policy states:

"During the application process, all students must submit official transcripts from all high schools; two-year and four-year institutions where they have previously been enrolled. Also, in accordance with federal law, students requesting financial aid will not be eligible to receive aid for subsequent academic semesters without all official transcript(s) on file"

"Applicants who have attended other institutions of higher education, after completing their high school degree, will be considered for admission as transfer students"

The reviewers found 2 transfer students in the sample that did not have a high school diploma in their file:

Student 3: The student began taking classes in the Fall 2012 semester; however, there was not a copy of a high school diploma in the file. There was a blank internal high school transcript form in the file. There was also a copy of an email in the file from the registrar's office to the student requesting a copy of the student's high school diploma due to a Department of Education audit.

Student 15: The student began taking classes in the Fall 2012 semester; however, there was not a copy of a high school diploma in the file.

The reviewers also did not see a policy to identify possibly invalid high school diplomas in the institution's catalog or policies manual. When questioned about the missing policy, school officials stated that there were no written policies regarding high school diploma procedures.

Required Action: School officials must provide proof that the students identified above either have a valid high school diploma or GED (#3, #15).

BC must also create a high school diploma policy to reflect the requirements of 34 C.F.R. § 668.16(p). Also refer to FSA Handbook, Volume 1, Chapter 1. The new policy must be provided to this office with BC's response to this finding.

Any liabilities for this finding will be addressed in the Final Program Review Determination (FPRD) letter.

Finding 4: Title IV Aid Paid for Coursework Not Required for Degree

Citation: 34 C.F.R. § 668.32 (a)(1)(i) states a student is eligible to receive Title IV, HEA program assistance if the student is a regular student enrolled, or accepted for enrollment, in an eligible program at an eligible institution.

The term "institution of higher education" means an educational institution in any state that provides an educational program for which the institution awards a bachelor's degree or provides not less than a 2 year program that is acceptable for full credit towards such a degree, or awards a degree that is acceptable for admission to a graduate or professional degree program, subject to review and approval by the Secretary.

Title IV, HEA, Section 101

If a student is enrolled in courses that do not count toward his degree, they cannot be used to determine enrollment status unless they are eligible remedial courses. This means you cannot award the student aid for classes that do not count toward his degree or certificate.

FSA Handbook, AVG, Chapter 4

Noncompliance: During the review, the reviewers noted that Title IV aid was paid for coursework not required for the student's degree of study.

BC's graduation policy states:

"In order to earn a baccalaureate degree at Brevard College, a student must complete a minimum of 124 semester hours in courses numbering 101 and above. A major normally consists of a minimum of 33 and a maximum of 55 credits that do not overlap the general education core."

Each student's major program must be arranged under the direction and with the approval of a faculty advisor and must be planned with a view toward obtaining reasonable mastery of a chosen field, with due provisions for work outside the field."

According to the Registrar, it was stated that right before graduation all student's courses are audited. The Registrar's office must examine all courses that a student has taken and find any courses that were not required for the student's degree and also locate any remaining courses that are needed for graduation. The Registrar also stated that due to students being able to take any liberal arts courses, occasionally students complete courses that are not required for the student's degree of study.

For students #3, #7, and #8, it appeared that these students may have enrolled in classes that were not required for their degree of study due to the degree audit request forms in the student's file.

Required Action: BC must review the courses for students #3, #7, and #8 to determine if the student completed any courses that were not required for the student's degree of study. BC must submit documentation of this review for these students.

BC must also review its disbursement procedures to determine the cause of the finding. Procedures must be updated to ensure that coursework that is not included in the student's degree of study is not used to determine enrollment status. Coordination and communication with the Academic Department, Registrar's Office and Financial Aid Office is essential in ensuring that BC reaches out to all involved parties. In response to this Program Review Report, BC must include a written update of its Disbursement Policy/Procedures to adhere to 34 C.F.R. § 668.32 (a)(1)(i).

Finding 5: Federal Work Study Violations-Timesheet Violations

Citation: Pursuant to 34 C.F.R. § 675.16, Federal Work-Study Program (FWS), an institution must pay a student FWS compensation at least once a month. It is the school's responsibility to monitor the FWS program. Students may not be scheduled for work and miss class time to perform FWS jobs.

34 C.F.R. § 675.19 states that in administering its FWS program, an institution shall establish and maintain an internal control system of checks and balances that insures that no office can both authorize payments and disburse funds to students.

Noncompliance: The reviewers were unable to determine if the FWS students in the sample were working during class hours. BC's FWS student work study time card included the day and number of hours worked but did not include the start time and end time for the work day.

With the current FWS timesheets, the Financial Aid Office can't monitor if students are working during class and therefore adhere to 34 C.F.R. § 675.16.

Required Action: BC must revise its FWS student work study time card to include start and end times. BC must also prepare FWS procedures on how to address monitoring BC time sheets.

These procedures must include financial aid's role in FWS monitoring of timesheets and disbursement of funds. A copy of these new procedures and revised time sheet must be submitted to this office in response to this finding.

Finding 6: Federal Work Study Violations-Job Descriptions Incomplete

Citation: FSA Handbook Volume 6, 6-44. A federal work study position should have a job description that includes the following:

- Name of the position
- Classification of the position (e.g., reading tutor 1, reading tutor 2, laboratory assistant, library technician 1 or 2, etc.)
- Name and address of the student's employer (the school, public agency, nonprofit organization, etc.)
- Department or office in which the student will be employed
- Location where the student will perform his/her duties
- Name of the student's supervisor
- Purpose/role of the position within the organization
- Duties and responsibilities associated with the position and how they relate to the purpose/role
- Rates of pay for the position (cross-referenced to the wage rates appearing in the school's policies and procedures manual)
- General qualifications for the position and the specific qualifications for the various levels/rates of pay associated with the position
- Length of the student's employment (beginning and ending dates) procedures for determining a student's rate of pay when a position has multiple rates
- Procedures for determining a student's rate of pay when a position has multiple rates
- Evaluation procedures and schedules

Noncompliance: For the FWS students in the sample (#4, #10, #18), there was a FWS contract form that indicated the student's department, hours per week and rate of pay; however, the institution did not have a specific work study job description in each of the FWS student's file. The reviewers were given a "Brevard College Work Study Program Job Descriptions" booklet. The generic job descriptions in this booklet only included the job title, job description and skills needed.

Required Action: In its response, BC must provide updated job descriptions for the students listed above. BC must also update its federal work study procedures for creating job descriptions for work study students. A copy of these revised job descriptions and procedures must be submitted to this office in response to this finding.

Finding 7: Attendance Policy Inadequate

Citation: 34 C.F.R. § 668.32(d), Student Assistance General Provisions, states that the school must establish and maintain records required under this part and the individual Title IV, HEA

program regulations for purposes of determining student eligibility for assistance under the Title IV, HEA program. This eligibility requirement includes tracking attendance at a clock or credit hour school.

34 C.F.R. 668.22, General Provisions, states when a recipient of Title IV grant or loan assistance withdraws from an institution during a payment period or period of enrollment in which the recipient began attendance, the institution must determine the amount of Title IV grant or loan assistance that the student earned as of the student's withdrawal date in accordance with paragraph (e) of 668.22.

Noncompliance: BC is not an attendance taking institution, however the attendance policy states:

"Students should expect to be eligible for course credit only if they attend at least 70% of the class meetings"

There is a discrepancy between the attendance policy and the actual attendance procedures that the institution is following. The reviewers were unsure how this attendance policy could be monitored if attendance taking was not a requirement of the institution and all faculty did not take attendance.

Required Action: BC must submit documentation to resolve this discrepancy between the attendance policy and BC's actual attendance procedures as it relates to Title IV students. This documentation must be provided to this office with BC's response to this finding.

Finding 8: Verification Notification not Adequately Developed

Citation: 34 C.F.R. § 668.32(a)(2)(e)(1) (a) An institution must require an applicant selected for verification to submit to it, within the period of time it or the Secretary specifies, the documentation set forth in §668.57 that is requested by the institution.

Your school must provide, in a timely manner, students selected for verification a clear explanation of their role, including what documents they must submit, the deadlines they must meet, and the consequences of failing to meet them.

FSA Handbook, AVG, Chapter 4

Noncompliance: The institution's verification notification states that the student must complete and return verification documents "as soon as possible" but does not address a specific time period in which the student must return the verification documents back to BC's Financial Aid Office. The verification notification also does not specify the consequences for the student if he/she does not submit the required verification documents.

Required Action: In its response, BC must revise its verification notification document to adhere to the citations above. A copy of this revised verification notification document must be submitted to this office in response to this finding.

Appendix E: Institution's Written Response

David Smittick
Compliance Manager

Angelique James
Senior Institutional Review Specialist

U.S. Department of Education
61 Forsyth Street, Room 18T40
Atlanta, GA 30303-3140

Re: OPE ID 002912 PRCN 2014-4-04-28773, Program Review Response

Mr. Smittick and Ms. James:

The following statements are to be considered Brevard College's responses to the findings of noncompliance referenced in the preliminary Program Review Report following the program review administered in August 2014.

Each finding has been reviewed and the necessary adjustments and corrective actions have been implemented to resolve the issues of the findings and ensure compliance with Title IV HEA statutes and regulations.

Narrative descriptions and supporting documentation are included in this response, and accompanying documents containing Personally Identifiable Information (PII) will be sent via encrypted files according to the PII protection protocols.

We look forward to the resolution of this program review process and receipt of the Final Program Review Determination.

Sincerely,



Dr. David C. Joyce
President
Brevard College

Finding 1 Response: Satisfactory Academic Progress Policy

Brevard College (BC) has created a specific Financial Aid Satisfactory Academic Progress (FA-SAP) policy that addresses the individual findings of the program review as well as the scope of the regulations governing SAP in regard to Title IV funds. The entirety of the policy is contained in Appendix I. Specific points addressed in the preliminary program review report have been rectified as follows:

- The FA-SAP policy explains the effect of course incompletes, withdrawals, and transfer credits on GPA and pace of completion. Pass/fail options are also accounted for in pace and GPA calculations under the new policy.
- Repeat courses are also accounted for in GPA and pace calculations within the new FA-SAP policy.
- In regard to maximum completion rate, the new FA-SAP policy allows for eligibility for all financial aid, both Title IV and institutional, under the 150% completion pace.
- The FA-SAP policy addresses the appeal process for students seeking to be placed on SAP probation, and a new appeal form (Appendix II) has been created with clear instructions on expectations and requirements of the student in order for an appeal to be granted.

Finding 2 Response: Inaccurate/Late Enrollment Reporting to the National Student Loan Data System

Status changes for students that indicated to the College that they would not return for the following term were not reported to the National Student Clearinghouse until the start of the subsequent term. While the majority of the effective dates were correct, the change of status was late for those students.

The College has updated end of term processes in the Registrar's Office to include a report to be sent to the National Student Clearinghouse indicating a status of withdrawn for students who have made official notice of their plans not to return by completing the "Notice of Intent to Not Return" form. Students will be noted in the College's database and a report of these students will be generated at the conclusion of the current semester. This report will be uploaded to the National Student Clearinghouse no more than 30 days after the end of each term. The College will only send updated statuses for students that have given official notice per guidelines listed below from the NSLDS Enrollment Reporting Guide.

"Students are considered to be in-school and continuously enrolled during academic year holiday and vacation periods, as well as during the summer between academic years (even if not enrolled in a summer session), as long as there is reason to believe that they intend to enroll for the next regularly scheduled term. For example, students should not be reported as

"Withdrawn" at the end of the spring term if they are expected to re-enroll for the fall term. If they do not return as expected, status must be changed to "Withdrawn" within 30 days of that determination, or within 30 days of the start of the new term, whichever occurs first, with an effective date of the last date of attendance."

From NSLDS Enrollment Reporting Guide found at:

<http://ifap.ed.gov/nsldsmaterials/attachments/NewNSLDSEnrollmentReportingGuide.pdf>

Review of Students #2, #8, #19, #30

Student #2

The student last attended Brevard College during Spring 2014 and completed the "Notice of Intent to Not Return" in March of 2014. The student was reported as full time on 5/6/2014 for the term that just concluded with the dates of 01/08/2014-05/01/2014. Brevard College sends enrollment reports to the National Student Clearinghouse every 30 days and this was the final report sent for the Spring 2014 semester. On 9/29/2014 an enrollment report was sent that noted an enrollment status of withdrawn and an effective date of 05/01/2014. This effective date is correct. The updated status was not reported in a timely fashion but it was reported accurately. The College's new policy will prevent this from occurring again.

Student #8

The students last attended Brevard College during Spring 2013 term. The student transferred coursework from another institution back to Brevard College in order to complete degree requirements during Summer 2013 and a degree was issued on 9/16/2013. The student was reported as full time on 5/1/2013 for the term that dated 1/9/2013-4/29/2013. On 9/10/2013 an enrollment report was sent that noted an enrollment status of withdrawn and an effective date of 04/29/2013. This effective date should have reflected the date of 5/6/2013. A correction to the effective date was submitted on 1/29/2015. While this student did not complete a "Notice of Intent to Not Return" form, the student did participate in commencement ceremonies as a summer candidate for graduation.

Student #19

The student last attended Brevard College during Spring 2014 and completed a "Notice of Intent to Not Return" form in May 2014. The student was reported as full time on 5/6/2014 for the term that just concluded with the dates of 01/08/2014-05/01/2014. Brevard College sends enrollment reports to the National Student Clearinghouse every 30 days and this was the final report sent for Spring 2014 semester. On 9/29/2014 an enrollment report was sent that noted an enrollment status of withdrawn and an effective date of 05/01/2014. This effective date is correct. The updated status was not reported in a timely fashion but it was reported accurately. The College's new policy will prevent this from occurring again.

Student #30

The student last attended Brevard College during Spring 2014. No official notice was given to the College that the student would not return for the following semester. The student was reported as full time on 5/6/2014 for the term that just concluded with the dates of 01/08/2014-05/01/2014. Brevard College sends enrollment reports to the National Student Clearinghouse every 30 days and this was the final report sent for Spring 2014 semester. On 9/29/2014 an

enrollment report was sent that noted an enrollment status of withdrawn and an effective date of 05/01/2014. This effective date is correct. In this instance, the college reported the student's status both accurately and in a timely fashion, given that there was reason to believe the student could return for the next term (see NSLDS guidelines listed above).

Documentation of corrections made to NSLDS statuses is included in the supplemental documents containing Personally Identifiable Information (PII) that must be sent via encrypted files.

Finding 3 Response: Ineligible High School Diploma/Missing High School Diploma Policy

Final high school transcripts for students #3 and #15 providing proof of high school graduation have been received and are a part of the students' academic record. Scanned copies of these transcripts are included in the supplemental documentation containing Personally Identifiable Information (PII) that must be sent via encrypted files.

Brevard College has developed a policy (Appendix III) to address the potential of invalid proof of high school graduation and the procedures that would follow in order to verify such validity.

Finding 4 Response: Title IV Aid Paid for Coursework Not Required for Degree

For students at Brevard College to earn a degree, three types of requirements must be met:

1. Overall graduation requirements
 - a. 124 credit hours
 - b. Cumulative 2.0 GPA
2. General Education Requirements
3. Major and/or Minor Requirements

When a student has met requirements 2 and 3 but still needs hours to reach 124 credits, Brevard College allows the student to take courses in any discipline that they choose, regardless of major, as open electives. These courses are still considered degree applicable as a student cannot earn a degree with fewer than 124 credits.

Review of Students #3, #7, and #8

Student #3

The student enrolled Fall 2012. Every course other than ORG 350 (taken Spring 2014) met general education or major requirements. ORG 350 is degree applicable because it is needed to reach 124 credit hours. (If the student had passed EXSC 415 in Summer 2014, 124 credit hours would have been completed and ORG 350 would have then been non-degree applicable, but since the student failed and earned no credit, ORG 350 remained applicable.)

Student #7

The student enrolled Fall 2011 and graduated in Spring 2014 with 171 credit hours. The student was a double major. During Fall 2013 the student was enrolled in 20 hours. 18 of these hours were needed for specific degree requirements. During Spring 2014 the student was enrolled in

21 hours. 17 of these hours were needed for specific degree requirements. During both of these semesters, courses needed for degree requirements accounted for full-time enrollment, and the additional "non-degree applicable" hours had no impact on cost or financial aid distribution since Brevard College is a flat-rate tuition institution (full-time students taking 12-19 credit hours are charged flat tuition and cost of attendance is calculated on this charge).

Student #8

The student enrolled in Spring 2009. Student was awarded a degree in Summer 2013 after transferring course work to Brevard College to complete degree requirements. Student's last semester at Brevard College was Spring 2013. Student enrolled in 19 credit hours and had a total of 119 hours earned at the completion of the semester. All hours earned at Brevard College were degree applicable since the student had not yet earned the 124 hours necessary to graduate.

In order to account for and attempt to avoid student registration in non-degree applicable coursework, BC has purchased and is in preparation for implementation of a software package for academic planning. Students will work in conjunction with academic advisers using this software to determine future course of study and to prepare for course registration. At the time of registration, the academic planning software will recognize any coursework that is not degree applicable and notification will be sent to the Financial Aid Office if registration in such courses is completed. Upon receipt of this notification, the Financial Aid Office can make any necessary adjustments to the determination of enrollment status and aid disbursement.

Finding 5 Response: Federal Work Study Violations – Timesheet Violations

Brevard College has revised its FWS time cards (Appendix IV) to indicate start and end times for hours worked. Review of these time cards will be administered by the FWS coordinator in the Financial Aid Office and disbursement of funds will be overseen accordingly upon timesheet review. Records are maintained and reviewed monthly, with hours calculated and compared to amount awarded, and then deducted from remaining eligibility before request for payment is submitted to the Business Office for payroll.

Finding 6 Response: Federal Work Study Violations – Job Descriptions Incomplete

Brevard College has updated job descriptions for all FWS positions on campus to be compliant with the FSA handbook regulations, and has implemented requirements for job description approval by the Financial Aid Office when offices request additional positions. All requests must contain the necessary components of the job descriptions required by FSA regulations before approval for position creation is granted. The Financial Aid Office has also updated the student/supervisor contract to better address FWS regulations. Updated contracts featuring job descriptions for students #4, #10, and #18 are included in the supplemental documents containing Personally Identifiable Information (PII) that must be sent via encrypted files. A blank sample contract is included in Appendix V.

Finding 7 Response: Attendance Policy Inadequate

Brevard College has updated its attendance policy (Appendix VI) and practice in order to successfully determine if students are meeting the required 70% of class attendance to earn course credit and remain eligible for financial aid for registered courses. Faculty will take attendance and provide this information to the Financial Aid Office for review of eligibility for financial aid.

Finding 8 Response: Verification Notification not Adequately Developed

Brevard College has updated its verification notification letters (Appendix VII) to inform students of the necessary timeframe in which they must submit verification documents, as well as the consequences of non-response.

Ineligible Disbursements (Non-Loan) - Cost of Funds and Administrative Cost Allowance

[illegible]

Totals	\$	145.76	\$	-
ACA Liability				

Interest Breakdown

Pell Grants	\$	145.76	\$	-
ACG	\$	-	\$	-
SMART	\$	-	\$	-
TEACH	\$	-	\$	-
FWS	\$	-	\$	-
FSEOG	\$	-	\$	-
Perkins	\$	-	\$	-
FWS-50% Match	\$	-	\$	-
FWS-No Match	\$	-	\$	-
FSEOG-No Match	\$	-	\$	-
Perkins-No Match	\$	-	\$	-

ACA Breakdown

FWS	
FSEOG	
Perkins	
FWS-50% Match	
FWS-No Match	

Breverad College OPEID: 002912
Appendix F: Cost of Funds

FSEOG-No Match
Perkins-No Match

\$	-	\$	-
\$	-	\$	-

FSEOG-No Match
Perkins-No Match

Total Campus-Based

\$	-	\$	-
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Appendix G: Estimated Calculation formula Description

The Estimated Actual Loss Formula (EALF) is used for only certain types of findings on ineligible FFEL and Direct Loan liabilities. The EALF estimates (1) the principal amount that has or will default; and (2) the interest and special allowance on the entire ineligible loan amount.

The EALF uses an institution's applicable cohort default rate (CDR) to estimate the amount of defaults from the ineligible principal amount. This is usually the institution's latest published CDR. Draft CDRs are not used unless there is no prior CDR.

Example: Ineligible Principal Loan Amount \$100,000
 Cohort Default Rate 10.0%
 Estimated Default Amount Due \$10,000

The EALF calculates interest and special allowance (SA), where applicable, on the entire amount of ineligible loan principal. The number of days used to calculate interest and special allowance is based on average historical data for various time periods for different types of schools.

Period	School Type	One-Year	Two-Year	Four-Year	Rate Types
Disbursement to Repayment		584	774	969	Interest & SA
Repayment to Default		418	498	619	SA
Repayment to Paid In Full		1659	1580	1712	SA

The EALF uses the actual interest rates in effect when the ineligible loans were disbursed and an annualized average of the quarterly special allowance rates in effect. The EALF divides the number of days in each time period so that changes in interest and special allowance rates are considered. The EALF also assumes that the ineligible loans were made in two disbursements after a 30-day delay.

Example for the Disbursement to Repayment Period for a Two-Year Institution (2004-05)

Variable Rate Ineligible Loans: \$40,000 subsidized and \$60,000 unsubsidized
Interest Rates: 04-05 (2.77), 05-06 (4.70), 06-07 (6.54)
SA Rates: 04-05 (1.45), 05-06 (1.55), 06-07 (0.53)

Subsidized Loan Amount (Interest and Special Allowance)

$$\begin{aligned} & \$40,000/2 \times (451 \times (.0422/365)) \\ & + \$40,000/2 \times (730 \times (.0625/365)) \\ & + \$40,000/2 \times (367 \times (.0707/365)) = \$4,964.61 \end{aligned}$$

Unsubsidized Loan Amount (Special Allowance Only)

$$\begin{aligned} & \$60,000/2 \times (451 \times (.0145/365)) \\ & + \$60,000/2 \times (730 \times (.0155/365)) \\ & + \$60,000/2 \times (367 \times (.0053/365)) = \$1,627.36 \end{aligned}$$

NOTE: The number of days of 774 for this time period is doubled to 1548 (451+730+367) because the principal amount is divided by two.

Similar calculations are made for the other two periods. The total liability is the sum of the default amount with the interest and special allowance calculations for all three periods.

Brevard Collge
 OPE ID 002912
 Appendix H - Estimated Loss Formula

Estimated Loss Formula

9/16/2013

Enter Institution Name

Brevard College

Select Institution Type

4 Yr

Select Type of Loan	Select Award Year	Enter Ineligible Loan Amount	Enter School CDR	Total Subsidy Costs
1 DL Subsidized	2012-2013	\$ 4,500.00	10.30%	3.49%
2 DL Unsubsidized	2012-2013	\$ 7,513.00	10.30%	-24.88%
3				
Description		\$ 12,013.00		
4 DL Subsidized	2013-2014	\$ 1,750.00	10.30%	0.00%
5 DL Unsubsidized	2013-2014	\$ 3,000.00	10.30%	0.00%
6				
Description		\$ 4,750.00		
7				
8				
9				
Description		\$ -		
10				
11				
12				
Description		\$ -		
Original Ineligible Loan Liability		\$ 16,763.00	Total Estimated Loss	

Brevard Collge
OPE ID 002912
Appendix H - Estimated Loss Formula

**Estimated Loss
Liability**

\$	157.21
\$	-
\$	157.21

\$	-
\$	-
\$	-

\$	-

\$	-

\$	157.21
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Accounting Document – Prior Year Monetary Recovery (AD-PYMR)

Institution: Brevard College
City, State: Brevard, North Carolina
PRCN: 2014-4-04-28773
TIN: 560532297
DUNS: 081427635

Reviewer: Angelique James **Region:** Atlanta **Date:** April 29, 2015

Section A - Use if no adjustments are being made in COD

Programs	Type	Amount	Funding Code	Object Class
Federal Pell Grant (Closed AY)	Principal		3220RNOYR	69017
	Interest		1435RNOYR	64020
FSEOG (No FISAP Corrections)	Principal		3220RNOYR	69017
	Interest		1435RNOYR	64020
FWS (No FISAP Corrections)	Principal		3220RNOYR	69017
	Interest		1435RNOYR	64020
Direct Loan and Direct Loan EAL	Principal	\$157	4253XNOYR	53020 or 53010
	Interest	\$0	4253XNOYR	53040

Section B: Use if the Institution is instructed to make adjustments in COD

Add rows if necessary	Program		Amount	Funding Code	Object Class	G5 Program Award # *
Pell, ACG, SMART, TEACH	Pell 2012-2013	Principal	\$4,175	3875FNOYR	69020	P063P121918
Pell, ACG, SMART, TEACH	Pell 2012-2013	Imputed Interest	\$109	1435RNOYR	64020	P063P121918
Pell, ACG, SMART, TEACH	Pell 2013-2014	Principal	\$2,457	3875FNOYR	69020	P063P131918
Pell, ACG, SMART, TEACH	Pell 2013-2014	Imputed Interest	\$37	1435RNOYR	64020	P063P131918
Direct Loan (do not use for estimated loss)						